

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**DEFENDANTS ZHEJIANG HUAHAI PHARMACEUTICAL CO., LTD.,
HUAHAI U.S., INC., PRINSTON PHARMACEUTICAL INC., AND SOLCO
HEALTHCARE U.S., LLC'S MOTION FOR LEAVE TO FILE THEIR
SECOND AMENDED ANSWER AND AFFIRMATIVE DEFENSES**

PLEASE TAKE NOTICE that on April 1, 2024, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”), by and through their undersigned counsel, shall move for the entry of an Order granting them leave to file their Second Amended Answer and Affirmative Defenses.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the ZHP Defendants shall rely on the accompanying Memorandum in Support of Motion for Leave and the exhibits thereto.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith;

PLEASE TAKE FURTHER NOTICE that oral argument is requested, if this motion is opposed; and

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: March 6, 2024

Respectfully submitted,

By: /s/ Jessica Davidson
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Inc., Princeton Pharmaceutical Inc., and
Solco Healthcare U.S., LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 6, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson
Jessica Davidson